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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No.: 11-CV-00638-SI**

**Plaintiff,**

**v.**

**WESTERN RADIO SERVICES CO.,**

**UNITED STATES' MOTION TO  
COMPEL ANSWERS TO  
QUESTIONS UNDER RULE 30 ORAL  
DEPOSITION**

**Defendant.**

**ORAL ARGUMENT REQUESTED**

Plaintiff, United States of America, by S. Amanda Marshall, United States

Attorney for the District of Oregon, and Neil J. Evans, Assistant United States Attorney for the

District of Oregon, pursuant to Fed R Civ. Pro. 26, 30 and 37, hereby moves this Court to compel

Richard Oberdorfer, owner of defendant Western Radio, to answer questions he failed to answer

during a deposition of September 27, 2011.

Pursuant to LR 7-1 plaintiff's counsel has conferred with defense counsel and made a good faith effort to resolve our disputes regarding the discovery of information, including the failure to answer deposition questions, identified in the supporting memorandum. The parties are in disagreement regarding the relevancy objections, privileges and other arguments set forth by the defense.

The United States seeks reasonable expenses pursuant to Fed. R. Civ. Pro. 37(a)(5) as well as an order requiring Richard Oberdorfer to appear at the U.S. Courthouse Portland, for a continuation of his deposition following his submission of full responses to the interrogatories sought by plaintiff.

Dated this 13th day of October, 2011.

Respectfully submitted,

S. AMANDA MARSHALL  
United States Attorney  
District of Oregon

/s/ Neil J. Evans  
NEIL J. EVANS  
Assistant United States Attorney